

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: 02/27/2009

Name of Company covered by this certification: Orbitel Communications, L.L.C.

Form 499 Filer ID: 826072

Name of signatory: Keith A. Kirkman

Title of signatory: President/Chief Executive Officer

I, Keith A. Kirkman, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning any unauthorized access, release or disclosure of CPNI.

A handwritten signature in black ink, appearing to read 'Keith A. Kirkman', written over a horizontal line.

Keith A. Kirkman

President/Chief Executive Officer



Policy Statement – CPNI Compliance

Background

Customer proprietary network information (CPNI) is the data collected by telecommunications companies about a consumer's telephone calls. It includes the time, date, duration and destination number of each call, the type of services a consumer subscribes to, and any other information that appears on the consumer's telephone bill. The FCC has set forth certain guidelines for how telecommunications companies use this kind of data. Effective December 6, 2007 the FCC determined that CPNI usage requirements will also apply to cable operators who offer telephony service. As of this date, Orbitel Communications is subject to these rules. The procedures below reflect our compliance with the CPNI rules.

Policies

Through use of the PIN number management functionality in the Great Lakes Subscriber Billing System ("WinCable"), you will now have the ability to "validate" an individual to verify their identity before accessing voice service related information on the WinCable account. The PIN number is shown in the Pay Per View setup window. Use of this functionality is **REQUIRED** if a customer has telephone service but may be skipped if the customer is not a phone subscriber.

1. This new functionality is available as a button from the main subscriber screen. The button will initially be **yellow** when you look up a subscriber, but will change colors once the subscriber has been validated (**Green** = validated; **red** = Validation failed).
2. To validate a customer, select the Validate PIN button and you will be asked to enter the 4 digit PIN after which you select the Validate button.
3. For new phone customers, you need to enter the **Net2Phone PIN** which is established at random at the time of account set-up, in the PPV setup for a customer.
4. This CPNI PIN will be the PIN that a customer uses to order PPV, access Cable Anytime, etc.
5. If the customer does not know their PIN, they can get no telephone related information on an account. **THERE ARE NO EXCEPTIONS TO THIS POLICY.** If a customer does not know their PIN and they wish to have information on their telephone service they must come into the office and provide a copy of their driver's license or photo id. This information must match the name on the WinCable account as that person is considered the only **AUTHORIZED ACCOUNT HOLDER** by FCC rules.